

REMARKS

Claims 1-3, 5-13, and 15-25 were previously pending in this patent application. Claims 1-3, 5-13, and 15-25 stand rejected. Herein, Claims 1, 10, and 20 have been amended. Accordingly, after this Amendment and Response, Claims 1-3, 5-13, and 15-25 remain pending in this patent application. Further examination and reconsideration in view of the claims, remarks and arguments set forth below is respectfully requested.

35 U.S.C. Section 103(a) Rejections

Claims 1-3, 8-9, and 20-22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Sirola et al., U.S. Patent No. 6,415,138 (hereafter Sirola), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), and in view of Post et al., U.S. Patent No. 6,210,771 (hereafter Post). These rejections are respectfully traversed.

Independent Claim 1 recites:

A user interface for a portable electronic device, said user interface comprising:

- a) a flexible display panel, said flexible display panel forming a first layer of said user interface; and
- b) a **flexible touch sensor disposed immediately under said flexible display panel**, said flexible touch sensor forming a second layer of said user interface, wherein said flexible touch sensor is operable to register a position where contact is made with a surface of said user interface, wherein a particular position on said user interface is translated into a particular command controlling said portable electronic device, wherein said flexible touch sensor comprises a fabric. (emphasis added)

It is respectfully asserted that the combination of Sirola, Lueders, and Post does not teach, motivate, or suggest the present invention as recited in Independent Claim 1. In particular, Independent Claim 1 recites the limitation, "**a flexible touch sensor disposed immediately under said flexible display panel,**" (emphasis added). In contrast, Sirola shows an activation means (5) or touch sensor that is disposed above the display panel (3) instead of showing a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 1. [Sirola; Figures 1, 2, and 3; Col. 4, line 30 through Col. 5, line 30]. Moreover, Lueders shows a keyboard assembly having a printed wire board (26) that has switches (28), a static shield (32) positioned over the printed wire board (26), a flexible electroluminescent panel (34) fixed over the static shield (32) for providing an ambient light, and a flexible display (36) fixed over the flexible electroluminescent panel (34). [Lueders; Figure 2; Col. 4, line 11-62]. That is, Lueders discloses a printed wire board (26) with switches (28) disposed under the flexible display (36) but separated by the flexible electroluminescent panel (34) and the static shield (32) instead of disclosing a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 1.

Furthermore, Post is directed to a conductive fabric for use as a keyboard (200) for a display (240), for use as a switch matrix (300), and for use a touch-sensitive fabric (400). Post fails to disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent

Claim 1. Therefore, it is respectfully submitted that Independent Claim 1 is patentable over the combination of Sirola, Lueders, and Post and is in condition for allowance.

Dependent Claims 2-3 and 8-9 are dependent on allowable Independent Claim 1, which is allowable over the combination of Sirola, Lueders, and Post. Hence, it is respectfully submitted that Dependent Claims 2-3 and 8-9 are patentable over the combination of Sirola, Lueders, and Post for the reasons discussed above.

With respect to Independent Claim 20, it is respectfully submitted that Independent Claim 20 recites similar limitations as in Independent Claim 1. In particular, the Independent Claim 20 recites the limitation "receiving input via a **flexible touch sensor disposed immediately under said flexible display panel**, " (emphasis added). As discussed above, the combination of Sirola, Lueders, and Post fails to teach, suggest, or motivate the cited limitation. Therefore, Independent Claim 20 is allowable over the combination of Sirola, Lueders, and Post for reasons discussed in connection with Independent Claim 1.

Dependent Claims 21-22 are dependent on allowable Independent Claim 20, which are allowable over the combination of Sirola, Lueders, and Post. Hence, it is respectfully submitted that Dependent Claims 21-22 are patentable

over the combination of Sirola, Lueders, and Post for the reasons discussed above.

Claims 10-13 and 18-19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kikinis et al., U.S. Patent No. 5,634,080 (hereafter Kikinis), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), and in view of Post et al., U.S. Patent No. 6,210,771 (hereafter Post). These rejections are respectfully traversed.

Independent Claim 10 recites:

A portable computer system comprising:

- a) a bus;
- b) a memory device coupled with said bus;
- c) a processor coupled with said bus;
- d) a flexible display panel coupled with said bus, said flexible display panel forming a first layer of a user interface; and
- e) a ***flexible touch sensor disposed immediately under said flexible display panel***, said flexible touch sensor forming a second layer of a user interface, wherein said flexible touch sensor comprises a fabric. (emphasis added)

It is respectfully asserted that the combination of Kikinis, Lueders, and Post does not teach, motivate, or suggest the present invention as recited in Independent Claim 10. In particular, Independent Claim 10 recites the limitation, "***a flexible touch sensor disposed immediately under said flexible display panel,***" (emphasis added). In contrast, Kikinis shows a touch-sensitive interface (27) that is disposed above the LCD display (25) instead of showing a flexible

touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 10. [Kikinis; Figure 2; Col. 4, lines 43-64]. Moreover, Lueders shows a keyboard assembly having a printed wire board (26) that has switches (28), a static shield (32) positioned over the printed wire board (26), a flexible electroluminescent panel (34) fixed over the static shield (32) for providing an ambient light, and a flexible display (36) fixed over the flexible electroluminescent panel (34). [Lueders; Figure 2; Col. 4, line 11-62]. That is, Lueders discloses a printed wire board (26) with switches (28) disposed under the flexible display (36) but separated by the flexible electroluminescent panel (34) and the static shield (32) instead of disclosing a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 10.

Furthermore, Post is directed to a conductive fabric for use as a keyboard (200) for a display (240), for use as a switch matrix (300), and for use a touch-sensitive fabric (400). Post fails to disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 10. Therefore, it is respectfully submitted that Independent Claim 10 is patentable over the combination of Kikinis, Lueders, and Post and is in condition for allowance.

Dependent Claims 11-13 and 18-19 are dependent on allowable Independent Claim 10, which is allowable over the combination of Kikinis, Lueders, and Post. Hence, it is respectfully submitted that Dependent Claims

11-13 and 18-19 are patentable over the combination of Kikinis, Lueders, and Post for the reasons discussed above.

Claims 5 and 23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Sirola et al., U.S. Patent No. 6,415,138 (hereafter Sirola), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), in view of Post et al., U.S. Patent No. 6,210,771 (hereafter Post), and in view of Colgan et al., U.S. Patent No. 6,483,498 (hereafter Colgan). These rejections are respectfully traversed.

Dependent Claim 5 and Dependent Claim 23 are dependent on allowable Independent Claims 1 and 20 respectively, which are allowable over the combination of Sirola, Lueders, and Post. Moreover, Colgan does not disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claims 1 and 20. Hence, it is respectfully submitted that Independent Claims 1 and 20 are patentable over the combination of Sirola, Lueders, Post, and Colgan for the reasons discussed above. Since Dependent Claims 5 and 23 depend from Independent Claims 1 and 20 respectively, it is respectfully submitted that Dependent Claims 5 and 23 are patentable over the combination of Sirola, Lueders, Post, and Colgan for the reasons discussed above.

Claim 15 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kikinis et al., U.S. Patent No. 5,634,080 (hereafter Kikinis), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), in view of Post et al., U.S. Patent No. 6,210,771 (hereafter Post), and in view of Colgan et al., U.S. Patent No. 6,483,498 (hereafter Colgan). This rejection is respectfully traversed.

Dependent Claim 15 is dependent on allowable Independent Claims 10, which is allowable over the combination of Kikinis, Lueders, and Post. Moreover, Colgan does not disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 10. Hence, it is respectfully submitted that Independent Claim 10 is patentable over the combination of Kikinis, Lueders, Post, and Colgan for the reasons discussed above. Since Dependent Claim 15 depends from Independent Claim 10, it is respectfully submitted that Dependent Claim 15 is patentable over the combination of Kikinis, Lueders, Post, and Colgan for the reasons discussed above.

Claims 7 and 25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Sirola et al., U.S. Patent No. 6,415,138 (hereafter Sirola), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), in view of Post et al., U.S. Patent No. 6,256,009 (hereafter Post), and in view of Lui et al., U.S. Patent No. 6,210,771 (hereafter Lui). These rejections are respectfully traversed.

Dependent Claim 7 and Dependent Claim 25 are dependent on allowable Independent Claims 1 and 20 respectively, which are allowable over the combination of Sirola, Lueders, and Post. Moreover, Lui does not disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claims 1 and 20. Hence, it is respectfully submitted that Independent Claims 1 and 20 are patentable over the combination of Sirola, Lueders, Post, and Lui for the reasons discussed above. Since Dependent Claims 7 and 25 depend from Independent Claims 1 and 20 respectively, it is respectfully submitted that Dependent Claims 7 and 25 are patentable over the combination of Sirola, Lueders, Post, and Lui for the reasons discussed above.

Claim 17 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kikinis et al., U.S. Patent No. 5,634,080 (hereafter Kikinis), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), in view of Post et al., U.S. Patent No. 6,256,009 (hereafter Post), and in view of Lui et al., U.S. Patent No. 6,210,771 (hereafter Lui). This rejection is respectfully traversed.

Dependent Claim 17 is dependent on allowable Independent Claims 10, which is allowable over the combination of Kikinis, Lueders, and Post. Moreover, Lui does not disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 10.

Hence, it is respectfully submitted that Independent Claim 10 is patentable over the combination of Kikinis, Lueders, Post, and Lui for the reasons discussed above. Since Dependent Claim 17 depends from Independent Claim 10, it is respectfully submitted that Dependent Claim 17 is patentable over the combination of Kikinis, Lueders, Post, and Lui for the reasons discussed above.

Claims 6 and 24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Sirola et al., U.S. Patent No. 6,415,138 (hereafter Sirola), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), in view of Post et al., U.S. Patent No. 6,210,771 (hereafter Post), and in view of Sandbach et al., U.S. Patent No. 6,333,736 (hereafter Sandbach). These rejections are respectfully traversed.

Dependent Claim 6 and Dependent Claim 24 are dependent on allowable Independent Claims 1 and 20 respectively, which are allowable over the combination of Sirola, Lueders, and Post. Moreover, Sandbach does not disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claims 1 and 20. Hence, it is respectfully submitted that Independent Claims 1 and 20 are patentable over the combination of Sirola, Lueders, Post, and Sandbach for the reasons discussed above. Since Dependent Claims 6 and 24 depend from Independent Claims 1 and 20 respectively, it is respectfully submitted that Dependent Claims 6 and 24

are patentable over the combination of Sirola, Lueders, Post, and Sandbach for the reasons discussed above.

Claim 16 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kikinis et al., U.S. Patent No. 5,634,080 (hereafter Kikinis), in view of Lueders, U.S. Patent No. 6,067,074 (hereafter Lueders), in view of Post et al., U.S. Patent No. 6,210,771 (hereafter Post), and in view of Sandbach et al., U.S. Patent No. 6,333,736 (hereafter Sandbach). This rejection is respectfully traversed.

Dependent Claim 16 is dependent on allowable Independent Claims 10, which is allowable over the combination of Kikinis, Lueders, and Post. Moreover, Sandbach does not disclose a flexible touch sensor disposed immediately under the flexible display panel, as in the invention of Independent Claim 10. Hence, it is respectfully submitted that Independent Claim 10 is patentable over the combination of Kikinis, Lueders, Post, and Sandbach for the reasons discussed above. Since Dependent Claim 16 depends from Independent Claim 10, it is respectfully submitted that Dependent Claim 16 is patentable over the combination of Kikinis, Lueders, Post, and Sandbach for the reasons discussed above.

CONCLUSION

It is respectfully submitted that the above claims, remarks, and arguments overcome all rejections. All remaining claims (Claims 1-3, 5-13, and 15-25) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 1-3, 5-13, and 15-25) are in condition for allowance.

The Examiner is urged to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

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Respectfully submitted,

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